

Millard H. Qualls, K9DIY

2129 South Rogers Street

Bloomington IN 47403

(812) 332-0074

e-mail: mhqualls@worldnet.att.net

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Magalie Roman Salas, Secretary
Federal Communications Commission
445 12 Street SW
Washington DC 20554

Subject: Petition for partial reconsideration on
FCC REPORT AND ORDER 99-412

98-143

My amateur radio operator's license is K9DIY, Extra Class. I have taught electronics in vocational school, sponsored high school amateur radio clubs, taught basic electronics, radio theory and repair to the Royal Saudi Arabian Army signal corps in Taif, Saudi Arabia. Also, I have been and am currently a mentor to aspiring new amateur radio operators. My other activities include traffic handling, emergency communications, teaching classes (theory and Morse Code) and Indiana Army MARS. I have been a volunteer examiner for several years.

I agree with two aspects of the REPORT AND ORDER 99-412. They are:

1. Requiring a 5 wpm proficiency in Morse Code for the Technician Plus and General Class License. I believe this is a reasonable accommodation.
2. Removing the physician's waiver for Morse Code Tests.

However, there are other areas with which I respectfully disagree and petition the Commission to institute changes in REPORT AND ORDER 99-412. They are as follows:

3. Technician and Technician Plus licensees are lumped into one data base. This is going to increase enforcement problems for the Commission. It seems to me that the present state of the art data systems would have no difficulty in keeping these two license classes separate. Therefore, I urge a separation of these two license classes in the data base.
4. There is in the REPORT AND ORDER an assumption that increased Morse Code skills will not necessarily increase an individual's ability to contribute to the advancement of the radio art. Facts are otherwise. Experimentation with five watts or less output power better known as QRP is almost exclusively done using Morse Code. Skills learned in low power operation can be useful in Emergency Communications, the first reason given in the "Basis and Purpose of the Amateur Radio Service" written by the Commission many years ago. Using five watts or less power decreases the problems of RF exposure.

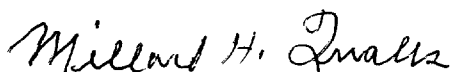
Furthermore, the scatter Modes (ionospheric and meteor) moon and northern light reflection require moderately-high to high speed Morse Code.

5. There are other reasons for maintaining a higher than 5 wpm Morse Code Requirement for the Extra Class License. Morse Code is an International Language. It transcends language barriers, dialects, political and social borders, barriers in this shrinking and approaching one neighborhood world. Morse Code proficiency above the basic 5wpm will be a positive asset for the unique ability of the radio amateur to enhance international good will as given in statement five of the "Basis and Purpose of the Amateur Radio Service". Furthermore, some countries may not reciprocate licenses if we have a 5 wpm maximum code speed requirement. See two attachments from the New Zealand Amateur Radio Service. They require 6 wpm for their novice class and 12 wpm for their general (highest) license class. It is clear from this information that a US Extra Class (under the system proposed by the Report and Order 99-412) cannot receive a novice class license in New Zealand! A US Extra Class will only be a technician (limited) in New Zealand! Many Americans visit New Zealand and some go to outlying islands for DX-peditions. They cannot accomplish much with only a technician class license. This condition will erode International Relations.
6. The Commission states that it wants to eliminate unnecessary barriers to those desiring to enter the Amateur Radio service. A noble idea, but reducing standards will not reduce barriers but will only weaken the service. My fifty years in Amateur Radio operating, training and other areas of education lead me to conclude that human beings respond to challenges. Lower the challenge and you cheapen the end result. When standards in any activity are lowered, apathy and decline will soon follow. My experiences tell me the only barriers are lack of motivation or unwillingness to study.

CONCLUSIONS

Items 4 and 5 above in my view conclusively prove we should have a higher Morse Code proficiency than 5 wpm for the Extra Class License. Therefore, in this petition for reconsideration, I respectfully ask the Commission to keep a 20 wpm code test for the Extra Class license. If the Commission cannot see the validity of 20 wpm, I petition that a minimum of 12 wpm (in order to parallel the requirement in many countries) be required. Furthermore, I petition the Commission to require a 100 item written for the Extra Class License. Item 6 above in my view is justification for a rigorous 100 item written test to cover digital techniques, radio receiver and transmitter theory, propagation theory and other advanced topics in Radio Communication. The Extra Class License should be EXTRA!

Sincerely,



Millard H. Qualls, K9DIY

Enclosures



7 FOREIGN AMATEURS

Foreign amateurs visiting New Zealand may be permitted to operate amateur apparatus provided that they are the holders of either a current amateur licence and/or an amateur operator's certificate, equivalent to a New Zealand Limited or General Certificate. The conditions that may be imposed will depend on the qualifications held by the applicant.

Visits less than four weeks

For visiting amateurs whose stay is less than four weeks, no application is required and no licence fees are payable. Operation is, however, limited to VHF and UHF bands above 144 MHz and verification of the licence/certificate may be required.

However, for visitors wishing to operate on New Zealand amateur frequencies below 144 MHz or intending to operate for a period of more than four weeks, there are two options available; either the issue of an authorisation for operation on the basis of a reciprocal agreement, for which no fee is payable, or application for a New Zealand licence on the basis of the applicant's amateur qualification, in which case a licence fee applies.

CEPT

New Zealand recently concluded an agreement with the European Community to be included in their CEPT (European Conference of Postal and Telecommunications Administrations) radio amateur licensing system. This system is regulated by Recommendation TR 61-01, and the licence holder is required to observe the provisions of the ITU Radio regulations, this recommendation and the regulations in force of the country visited.

Reciprocal agreements

New Zealand has reciprocal agreements with several countries where there is mutual recognition of amateur examination criteria and licences. An authorisation will be issued upon presentation of the applicant's current amateur licence and the required application form. Application and licence fees may be paid at any field office of the Communications Division, Ministry of Commerce.

Countries that New Zealand currently has reciprocal agreements with are:

Country	Licence Type(s)	NZ Equivalent
United States of America	Extra Class	General
	Advanced Class	General
	General Class	General
	Technician Class	Limited
European Community Countries	CEPT Class 1	General
	CEPT Class 2	Limited



8 RECOGNITION OF FOREIGN QUALIFICATIONS

New Zealand recognises the **amateur qualifications** of several countries. Based on these qualifications, an equivalent New Zealand amateur licence will be issued on payment of the annual licence fee. These countries are:

Country	Certificate	NZ Equivalent
Malaysia	Malaysian Licence	General
Australia	Unrestricted (A Grade) Restricted Novice	General Limited Novice
Canada) Information is not available on equivalent qualifications for these countries whose amateur qualifications are also recognised. Any inquiries should be directed to the nearest field office of the Communications Division, Ministry of Commerce.	
Botswana		
Cook Islands		
India		
Republic of Ireland		
Papua New Guinea		
Niue		
Zimbabwe		
Tonga		

Callsigns

Callsigns to be used by visiting amateurs will consist of their home callsign followed by the ZL prefix e.g., VK1AA/ZL.



9 EXAMINATION INFORMATION

The examination for an Amateur Operators Certificate is set within the provisions of the Radiocommunications Act (1989) and Radio Regulations (1987).

The elements of the examination, and the standard required for a pass are:

Grade	Section A	Section B	Section C (words per minute)
General	50%	50%	12
Limited	50%	50%	—
Novice	30%	50%	6

Section A comprises a multiple choice examination in the principles of electricity, radiotelegraphy, and radiotelephony, and in the adjustment and operation of radio apparatus used in a typical amateur installation.

Section B comprises a multiple choice examination in relation to the Radio Regulations, operating procedures, service codes and abbreviations as are applicable to the amateur service.

The time allowed for the written portion of the examination is three hours, irrespective of whether one section or two sections are being taken.

Section C is a morse operating test, both sending and receiving. Each element will last for three minutes, and will contain both letters and figures. A figure is equivalent to two letters, and a word is equivalent to five letters.

The sending test is to be by hand, and the receiving test is to be written.